

REMARKS

This request for reconsideration is made in response to an Office Action dated June 4, 2003, having a shortened period of response set to expire on November 4, 2003 with a two-month extension, in which Claims 1-4, 6-10, 17, 23-24 were rejected under 35 U.S.C. 103(a) as being obvious over Wood et al. (6,392,681 B1) in view of Terrell, Jr. et al. (5,473,984).

Claims 1-24 are pending in the present application. Claims 1-4, 6-10, 17, 23-24 stand rejected; Claims 11-13, 14-16, 20-22 are allowed; and Claims 5, 18, and 19 are deemed allowable.

Claim 1 of the present invention recites a printer having a printhead assembly for printing on a sheet material disposed on a worksurface, said printhead assembly including a plurality of printing elements, said printer comprising: a printhead support structure for supporting said printhead assembly; means for securing said printhead assembly to said printhead support structure; and means for adjusting angular orientation of said plurality of printing elements of said printhead assembly with respect to said worksurface. Thus, Claim 1 specifically recites a printer having a means for securing the printhead assembly to the printhead support structure and means for adjusting angular orientation of the printing elements with respect to the worksurface.

The Wood reference does not specifically teach or suggest what Claim 1 of the present invention recites. More specifically, Wood does not teach or suggest means for adjusting angular orientation of the plurality of printing elements with respect to the worksurface, as recited in Claim 1 of the present invention. Although the Wood reference discloses a trunnion joint and a trunnion pin (column 28, lines 60-62), the Wood reference does not specifically teach or suggest the means for adjusting angular orientation of the printing elements, as recited in the claims of the present invention. The present invention specifically discloses and teaches means for adjusting angular orientation 902 (paragraphs 167 - 171 and Figs. 19A-19F). The means for adjusting angular orientation, as disclosed and claimed in the present

invention, allows adjustment for the most advantageous orientation of the printhead for each individual printhead, which is critical for achieving good contact between the printing elements and the printing sheet to result in best print density.

The Terrel reference also does not teach or suggest what Claim 1 of the present invention recites. More specifically, the Terrel reference also does not teach or suggest the means for adjusting angular orientation, as disclosed and claimed in the present invention. Although Terrell discloses how to adjust the fore and aft positions of the printhead, Terrell does not address issues related to achieving good contact between the printing elements and the printing sheet.

Since neither the Wood reference nor the Terrell reference teaches or suggests what Claim 1 of the present invention recites, rejection of Claim 1 under 35 U.S.C. 103(a) should be withdrawn and Claim 1 passed to issue.

Claims 2-4 and 6-8 depend from Claim 1 and include additional recitations thereto. Therefore, for at least the reasons described above, Claims 2-4 and 6-8 are not rendered obvious by the cited references.

More specifically, Claim 2 additionally recites that the means for adjusting angular orientation is at least one means for engaging said pin with said at least one means for engaging allowing adjustment of the printhead assembly to properly position the printing elements with respect to the worksurface. Claim 6 depends from Claim 2 and further recites that the means for engaging is a set screw fitting into a threaded opening defined within the printhead assembly to engage the pin. Claim 7 depends from Claim 6 and still further recites that the set screws is adjusted to affect adjustment of the printhead assembly position.

In contrast to recitation of claims 2, 6 and 7, neither the Wood reference nor the Terrell reference teaches or suggests either means for engaging the pin, means for engaging the pin being a set screw, or adjusting set screw to affect adjustment of the printhead assembly position. Therefore, as stated above, rejection of claims 2-4 and 6-8 under 35 U.S.C. 103(a) should be withdrawn and claims 2-4 and 6-8 passed to issue.

Claim 9 is an independent claim and recites a printer having a printhead assembly for printing on a sheet material disposed on a worksurface, said printhead assembly including a plurality of printing elements, said printer comprising: a printhead support structure for removably supporting said printhead assembly; a pin for removably securing said printhead assembly to said printhead support structure, said pin fitting through said printhead assembly and engaging said printhead support structure; and at least one set screw engaging said pin for adjusting angular orientation of said printing elements of said printhead assembly with respect to said worksurface. Thus, independent claim 9 specifically recites at least one set screw engaging said pin for adjusting angular orientation of the printing elements of the printhead assembly with respect to the worksurface.

As discussed above, the Wood reference does not teach or suggest a set screw that engages the pin to adjust angular orientation of the printing elements of the printhead assembly with respect to the worksurface. Similarly, the Terrell reference does not teach or suggest a set screw that engages the pin to adjust angular orientation of the printing elements of the printhead assembly with respect to the worksurface.

For a rejection under 35 USC § 103 to be valid, a motivation or suggestion to combine references is required. No such motivation or suggestion to combine the references exists. However, even if the two references were to be combined, the combination of the cited references still would not render Claim 9 of the present invention obvious. Therefore, rejection of claim 9 under 35 U.S.C. 103(a) should be withdrawn and claim 9 passed to issue.

Claim 10 depends from claim 9 and includes additional recitations thereto. Thus, for at least the reasons described above, claim 10 is not rendered obvious by either the Wood reference, the Terrell reference, or the combination thereof. Therefore, rejection of claim 10 under 35 U.S.C. 103(a) should be withdrawn and claim 10 passed to issue.

Claim 17 recites a printer having a printhead assembly for printing on a sheet material disposed on a worksurface, said printer comprising: a printhead support

structure for removably supporting said printhead assembly; a pin for securing said printhead assembly to said printhead support structure, said pin fitting through said printhead assembly and engaging said printhead support structure; and at least one cam cooperating with said pin to adjust position of said printhead with respect to said edge of said strip material. Thus, claim 17 specifically recites a pin and at least one cam cooperating with the pin to adjust position of the printhead with respect to an edge of the strip material.

The Wood reference does not teach or suggest a cam cooperating with a pin to adjust position of the printhead with respect to the edge of the strip material. Similarly, the Terrell reference also does not teach or suggest a cam cooperating with a pin to adjust position of the printhead with respect to the edge of the strip material. Therefore, rejection of claim 17 under 35 U.S.C. 103(a) should be withdrawn and claim 17 passed to issue.

Claim 23 specifically recites a printer having a printhead assembly for printing on a sheet material disposed on a worksurface, said printhead assembly including a plurality of printing elements, said printer comprising: a printhead support structure for supporting said printhead assembly; means for securing said printhead assembly to said printhead support structure; means for adjusting angular orientation of said printing elements of said printhead assembly with respect to said worksurface; and means for adjusting skew of said printhead assembly with respect to an edge of said sheet material. Thus, claim 23 recites means for adjusting angular orientation of the printing elements and means for adjusting skew of the printhead assembly.

As discussed above, the Wood reference teaches neither means for adjusting angular orientation nor means for adjusting skew, as recited in claim 23 of the present invention. The Terrell reference also does not teach or suggest the means for adjusting angular orientation, as disclosed and claimed in the present invention. Although Terrell discloses how to adjust the fore and aft positions of the printhead, Terrell does not teach adjustment of angular orientation of the printhead for achieving good contact between the printing elements and the printing sheet. Thus,

rejection of claim 23 under 35 U.S.C. 103(a) should be withdrawn and claim 23 passed to issue.

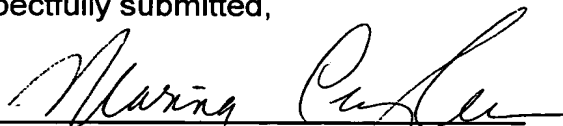
Claim 24 depends from claim 23 and includes additional recitations thereto. Therefore, for at least the reasons discussed above, claim 24 is not rendered obvious by the Wood or Terrell references. Additionally, claim 24 specifically recites that the means for adjusting angular orientation is at least one set screw engaging the pin and said means for adjusting skew is at least one cam cooperating with the pin. Neither the Terrell nor the Wood reference teaches neither set screw nor cam engaging or cooperating with a pin, as recited in claim 24. Therefore, rejection of claim 24 under 35 U.S.C. 103(a) should be withdrawn and claim 24 passed to issue.

Applicants gratefully acknowledge Examiner's indication that Claims 11-13, 14-16, 20-22 are allowed and Claims 5, 18, and 19 are deemed allowable. As applicants have addressed each and every objection and rejection raised by the Examiner, it is respectfully requested that the Examiner reconsider the rejection of Claims 1-4, 6-10, 17, 23-24 and pass claims 1-24 to issue.

Applicants hereby petition for a two(2) month extension of time and include a check in the amount of \$410.00 therefor. However, if additional fees are required, please charge any underpayment or credit any overpayment to Deposit Account No. 13-0235.

Respectfully submitted,

By



Marina F. Cunningham
Registration No. 38,419
Attorney For Applicant

McCormick, Paulding & Huber
185 Asylum Street, CityPlace II
Hartford, CT 06103-3402
(860) 549-5290